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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD GREGORY, On Behalf of Himself)	Case No. C-04-4293-VRW
and All Others Similarly Situated,)	
Plaintiff,)	CLASS ACTION
vs.)	STIPULATION REGARDING
CHIRON CORPORATION, HOWARD H.)	SUPPLEMENTAL POST-CARD NOTICE
PIEN, JOHN A. LAMBERT and DAVID V.)	REGARDING CHANGE OF DATE OF
SMITH,)	SETTLEMENT HEARING; [PROPOSED]
Defendants.)	ORDER

STIPULATION REGARDING SUPPLEMENTAL POST-CARD NOTICE REGARDING CHANGE OF DATE OF SETTLEMENT HEARING; [PROPOSED] ORDER CASE NO.: C-04-4293-VRW	
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WHEREAS, on July 7, 2008, the Court advised counsel of the need to change the date of the hearing to consider the proposed settlement, after some of the approved forms of mail notice and the publication notice went out, and

WHEREAS, to correct, in an effective and cost efficient manner, the mail notices that have already gone out, the parties request the Court to approve a mailing to those who were already mailed the notices, of a post-card containing the following text:

NOTICE OF CHANGE OF HEARING DATE

This Notice relates to the *In re Chiron Corporation Securities Litigation*, pending before the Honorable Vaughn R. Walker in the United States District Court for the Northern District of California, San Francisco Division, as Case No. C-04-4293-VRW.

We recently sent you, and other persons believed to have purchased Chiron Corporation common stock during the period from July 23, 2003 through October 5, 2004, a “Notice of Pendency of Class Action and Proposed Settlement Thereof, Motion for Attorneys’ Fees and Settlement Fairness Hearing” (the “Settlement Notice”).

Please note that the date for the Settlement Fairness Hearing previously announced in the Settlement Notice has been changed to **October 6, 2008** at 10:00 a.m. The Settlement Notice, which contains important information about Class Members’ rights, is otherwise unchanged.

If you have any questions about the Settlement or the litigation, you may contact the Claims Administrator:

Chiron Corporation Securities Litigation Settlement
c/o Gilardi & Co. LLC
Claims Administrator
P.O. Box 8040
San Rafael, CA 94912-8040

Copies of the full Settlement Notice and other information may be viewed or downloaded at www.chironlitigation.com

WHEREAS, to correct, in an effective and cost efficient manner, the mail notices that are mailed after July 7, 2008, an insert is to be included in the Settlement Notice saying "Important Notice The date of the Settlement Fairness Hearing in this litigation has been changed by order of the Court. The new date of the Settlement Fairness Hearing is Monday, October 6, 2008 at 10:00 a.m.," and

WHEREAS, the publication notice was published in the national edition of *The Wall Street Journal*, and in *Investor's Business Daily* on July 9, 2008. The publication notices, which were typeset and scheduled for publication prior to July 7, 2008, included the original October 2, 2008 hearing date. No correction is needed because the publication notice essentially alerts potential Class Members to get the full printed notices, and anyone requesting the full notice in response to the publication notice will receive notice of the re-scheduled hearing date.

NOW THEREFORE, the parties stipulate, agree and jointly respectfully request that the Court approve the foregoing steps for notifying Class Members of the change in the date for the hearing on the settlement, including through the mailing of post-cards, with substantially the above text, to the persons who were mailed the notices showing the previously scheduled hearing date.

DATED: July 14, 2008

MILBERG LLP
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/s/ Jeff S. Westerman
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DATED: July 14, 2008

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*Counsel for Defendant Novartis Vaccines and
Diagnostics, Inc. (formerly known as Chiron
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1 DATED: July 14, 2008

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*Counsel for Defendants Novartis Vaccines and
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Corporation), Howard H. Pien, John A.
Lambert and David V. Smith*

* * *

ORDER

The above stipulation having been considered and good cause appearing therefore, the Court approves the steps described in the foregoing Stipulation for notifying Class Members of the change in the date for the hearing on the settlement, including through the mailing of post-cards, with substantially the above text, to the persons who were mailed the notices showing the previously scheduled hearing date.

IT IS SO ORDERED.

DATED: July 15, 2008



HONORABLE VAUGHN R. WALKER
JUDGE OF THE DISTRICT COURT

SIGNATURE ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a “conformed” signature (/s/) within this e-filed document.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

/s/ Jeff S. Westerman

JEFF S. WESTERMAN

DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, employed in the County of Los Angeles, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is One California Plaza, 300 South Grand Avenue, Suite 3900, Los Angeles, California 90071-3149.

2. That on July 14, 2008, declarant served the **STIPULATION REGARDING SUPPLEMENTAL POST-CARD NOTICE REGARDING CHANGE OF DATE OF SETTLEMENT HEARING; [PROPOSED] ORDER** by depositing a true copy thereof in a United States mailbox at Los Angeles, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

4. That on the above date, declarant served via e-mail to: scac@law.stanford.edu.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of July, 2008, at Los Angeles, California.


ELIZABETH VILLALOBOS

SERVICE LIST

Richard Gregory v. Chiron Corporation, et al.
 USDC ~ San Francisco - Case No.C-04-4293-VRW

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